



Pamela I.S. Missal
Senior Environmental Counsel

17 2001

July 10, 2001



Deena Sheppard-Johnson
Enforcement Specialist
U.S. Environmental Protection Agency
Remedial Enforcement Support Section
77 West Jackson Boulevard (SR-6J)
Chicago, IL 60604-3590

RE: Special Notice Letter - Chemical Recovery Systems, Inc. Site, Elyria, Ohio

Dear Ms. Sheppard-Johnson:

Crompton Manufacturing Company, Inc. (formerly known as Uniroyal Chemical Company, Inc.) (hereinafter, "CMCI") is in receipt of correspondence from Wendy Carney, U.S. EPA (dated June 26, 2001) relating to the above-referenced site ("Site"). Since its receipt of the initial general notice letter directed to Uniroyal, Inc. (dated March 2, 2001), CMCI has received information provided by U.S. EPA by letter dated May 18, 2001 concerning the alleged involvement of Uniroyal, Inc. at the Site (the "FOIA Response"). Based upon CMCI's review and evaluation of that information, it sees no basis for the imposition of liability upon it.

The alleged involvement of Uniroyal, Inc. at the Site, as described in the FOIA Response, relates to the period from 1975 to 1980; the Site itself apparently operated from approximately the 1940s to 1981. As CMCI has advised U.S. EPA previously, it did not exist as a distinct corporate entity during the period of Site operations. Rather, CMCI was formed as a subsidiary of Uniroyal, Inc. in 1985 and subsequently was sold by Uniroyal, Inc. in 1986. Uniroyal, Inc. later dissolved. Prior to the formation of CMCI in 1985, Uniroyal Chemical existed as a division of Uniroyal, Inc.

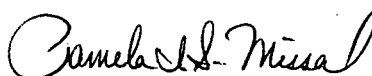
The FOIA Response provides no information even suggesting that CMCI may be the successor with respect to the alleged Uniroyal, Inc. involvement at the Site. With that said, I note that June 26, 2001 special notice letter states "... that additional information has been obtained since the previous [general] notice." To the extent that U.S. EPA has additional information beyond that provided in the FOIA Response relating to the alleged Uniroyal, Inc. involvement, please consider this a request that U.S. EPA supplement the FOIA Response to provide any additional information responsive to CMCI's March 15, 2001 FOIA request.

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Pending receipt of such information, CMCI may opt to supplement this response.

Should you have any questions, please feel free to contact the undersigned.

Sincerely yours,

A handwritten signature in cursive script, reading "Pamela I.S. Missal". The signature is written in black ink and is positioned above the printed name.

Pamela I.S. Missal

cc: J. Bailot

